

RFX Number: 47800-SOS0000037	RFX Title: Statewide Voting System
Requesting State Entity: Secretary of State	

REDACTED INFORMATION

2.1.12.2.2 Submission of Redacted Copies: *If Supplier considers any portion of its bid/proposal to the solicitation to be trade secret or otherwise not subject to public disclosure under Georgia Open Records Act, Supplier must, in addition to the required original documents, provide a separate redacted electronic copy of its bid/proposal, preferably in PDF format, and briefly describe in a separate writing, as to each item redacted, the grounds for claiming exemption from the public records law, including citation to the appropriate exemption from disclosure requirements provided under Georgia law. This redacted copy should be clearly marked "Redacted Copy-Available for Public Review." In addition, the electronic file name should include the words "Redacted Copy" at the beginning of the file name.*

ES&S RESPONSE

ES&S has identified certain sections of its bid/proposal to the solicitation to be commercial information of ES&S, a trade secret or otherwise not subject to disclosure under the Georgia Open Records Act. ES&S has set forth those sections of its bid/proposal below as well as the grounds upon which ES&S is claiming exemption from the public records law, including the citation to the appropriate exemption from disclosure under Georgia law. ES&S respectfully requests that the following information be withheld from disclosure in the event of a public records request.

ES&S Bid/Proposal Section	Justification for Exemption from Disclosure
ES&S Original Response	
Cover Letter – ES&S Personnel Contact Information.	GA Code 50-18-20(A) – Records that reveal an individual's cellular telephone number and email address.
Attachment C, Page 4, Item #6 Security Features	GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential. United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed. The commercial information contained within this section sets forth ES&S' voting system security features which are commercial information of ES&S; the disclosure of which would cause substantial harm to ES&S.
Appendix A, Statement of Work	GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential. United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.

	<p>The information contained within Appendix A sets forth ES&S' voting system implementation processes and procedures which is commercial information of ES&S. This proprietary information is utilized by ES&S in implementing a voting system; the disclosure of which would cause substantial harm to ES&S by allowing competitors to understand all of the details necessary to implement ES&S' voting system.</p>
Appendix C, System Development Program and Coding Standards	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The information contained within this section sets forth ES&S' proprietary system development program and coding standards which contain ES&S' commercial information. The information contained within Appendix C consists of specific proprietary techniques and practices ES&S utilizes in developing its software; the disclosure of which would cause substantial harm to ES&S.</p>
0-4 – Project Team Org Chart and Resumes	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The commercial information contained within this section sets forth ES&S' organization chart and resumes containing private personal information associated with those individuals who will be performing the services under the project; the disclosure of which would cause substantial harm to ES&S.</p>
0-6 – Financial Statements	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>Pursuant to Section 2.1.12.2.3 of the Request for Proposal, audited financial statements will be withheld from disclosure.</p>

	<p>The information contained within this section includes ES&S' Audited Financial Statements which ES&S is not required to disclose publicly as ES&S is a private company.</p>
0-7 References – Contact Telephone Numbers	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The commercial information contained within this section sets forth ES&S' references contact information which, to the extent not otherwise publicly available, is valuable commercial information of ES&S.</p>
1-1 – Project Team Org Chart and Resumes	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The commercial information contained within this section sets forth ES&S' organization chart and resumes containing private personal information associated with those individuals who will be performing the services under the project; the disclosure of which would cause substantial harm to ES&S.</p>
1-3 – Client List	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The information contained within this section sets forth ES&S' client list which is valuable commercial information of ES&S; the disclosure of which would cause substantial harm ES&S.</p>
9-1 to 9-3 and 10-1 – Training Course Description	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p>

	<p>The information contained within this section sets forth ES&S' proprietary training program which is valuable commercial information of ES&S; the disclosure of which would harm ES&S by allowing other individuals and/or entities to copy ES&S' training programs for use in other jurisdictions.</p>
12-1 – Org Chart and Project Management Narrative	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The commercial information contained within this section sets forth ES&S' organization chart and proprietary project management processes used by ES&S in implementing its voting system; the disclosure of which would cause substantial harm to ES&S.</p>
12-3 to 12-6 – Implementation Timeline	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The information contained within this section sets forth ES&S' voting system implementation timeline with is commercial information of ES&S; the disclosure of which would cause substantial harm to ES&S.</p>
13-2 System Test Plan, Use Case and Test Case	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The commercial and trade secret information contained within this section sets forth ES&S' proprietary System Test Plan, Use Case and Test Case of ES&S; the disclosure of which would cause substantial harm to ES&S.</p>
14-1 – Project Narrative and Project Timeline	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial</p>

	<p>or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The commercial information contained within this section sets forth ES&S' proprietary project management processes used by ES&S in implementing its voting system; the disclosure of which would cause substantial harm to ES&S.</p>
18-1 Full TDP	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>GA Code 50-18-72(34) Trade Secret Information shall not be disclosed. Please see the attached affidavit titled Full TDP Affidavit.</p> <p>The trade secret and commercial information contained within this section sets forth ES&S' voting system technical data package which identifies all technical features and functions of ES&S' voting system. The Technical Data Package is the roadmap as to how ES&S' voting system was developed; the disclosure of which would cause substantial harm ES&S.</p>
18-2 System Diagrams	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The commercial information contained within this section sets forth ES&S' system diagrams. ES&S' system diagrams provide a flowchart on how ES&S' system would be configured for the State of Georgia; the disclosure of which would cause substantial harm to ES&S.</p>
18-3 User Manuals	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The commercial information contained within ES&S' User</p>

	<p>Manuals sets forth the highly confidential processes, procedures, administrative functions and passwords utilized to operate ES&S' voting system; the disclosure of which would create significant security risks for the State and cause substantial harm to ES&S. ES&S' User Manuals are licensed by ES&S to its customers subject to certain license restrictions.</p>
18-4 Storage Guidelines	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The commercial information contained within ES&S' storage guidelines sets forth the ES&S process of storing its equipment with set up guideline and other information; the disclosure of which would substantial harm to ES&S.</p>
18-5 to 18-6 Training Manuals	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The commercial information contained within ES&S' Training Manuals contain specific proprietary details on how to train election officials on the operation of ES&S' voting systems; the disclosure of which would cause substantial harm to ES&S.</p>
ES&S' Clarification Responses Due June 3, 2019	
02_Supplier Proposal Clarification Response Form (ESS) – ES&S Responses to Questions #2.2, #3.2, #4.3, #5.2, #7.3	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The commercial information contained within these sections set forth the proprietary process ES&S utilizes in performing validation on its products. This commercial and trade secret information is related to the security of ES&S system; the disclosure of which would create significant security risks for the State and cause substantial harm ES&S.</p>

<p>02_Supplier Proposal Clarification Response Form (ESS) – ES&S Responses to Questions #9.1, #9.2, #9.3, #10.1, and #10.2,</p>	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The information contained within this section sets forth ES&S' proprietary training program which is valuable commercial information of ES&S; the disclosure of which would harm ES&S by allowing other individuals and/or entities to copy ES&S' training programs for use in other jurisdictions.</p>
<p>03_Proposal Clarification Supplemental Document (ESS) – ES&S Responses to Question #1.1</p>	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The commercial information contained within this section sets forth ES&S' organization chart and proprietary project management processes used by ES&S in implementing its voting system; the disclosure of which would cause substantial harm to ES&S.</p>
<p>03_Proposal Clarification Supplemental Document (ESS) – ES&S Responses to Questions #2.2, #3.2, #4.3, #5.2, #7.3</p>	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The commercial information contained within these sections sets forth the proprietary process ES&S utilizes in performing validation on products. This commercial information is related to the security of ES&S system; the disclosure of which would create significant security risks for the State and cause substantial harm ES&S.</p>
<p>03_Proposal Clarification Supplemental Document (ESS) – ES&S Responses to Questions #9.1, #9.2, #9.3, #10.1, #10.2</p>	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p>

	<p>The information contained within this section sets forth ES&S' proprietary training program which is valuable commercial information of ES&S; the disclosure of which would harm ES&S by allowing other individuals and/or entities to copy ES&S' training programs for use in other jurisdictions.</p>
<p>03_Proposal Clarification Supplemental Document (ESS) – ES&S Responses to Questions #12.4 (Pages 150-153) and #12.5 (157-160)</p>	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The information contained within this section sets forth ES&S' voting system implementation timeline with is commercial information of ES&S; the disclosure of which would cause substantial harm to ES&S.</p>
<p>04_Attachment A – Training Documentation (ESS)</p>	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The information contained within Appendix A sets forth ES&S' proprietary voting system implementation processes and procedures which is commercial information of ES&S. This information is utilized by ES&S in implementing a voting system; the disclosure of which would cause substantial harm to ES&S by allowing competitors to understand all of the details necessary to implement ES&S' voting system.</p>
<p>05_Attachment B – State of Georgia Updated Project Plan (ESS)</p>	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The information contained within this section sets forth ES&S' voting system implementation timeline with is commercial information of ES&S; the disclosure of which would cause substantial harm to ES&S.</p>
<p>ES&S' Negotiations Responses Due June 18, 2019</p>	
<p>Georgia_negotiation_response_06-</p>	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be</p>

17-19_full (Pages 3-10 Client List)	<p>required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The information contained within this section sets forth ES&S' client list which is valuable commercial information of ES&S; the disclosure of which would cause substantial harm ES&S.</p>
Georgia_negotiation_response_06-17-19_full (Page 11 Validation)	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The commercial information contained within this section sets forth the proprietary process ES&S utilizes in performing validation on products. This commercial information is related to the security of ES&S system; the disclosure of which would cause substantial harm ES&S.</p>
ES&S' Supplemental Responses Due June 24, 2019	
Supplemental Technical Response (Pages 2-7)	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The information contained within this section sets forth ES&S' client list which is valuable commercial information of ES&S; the disclosure of which would cause substantial harm ES&S.</p>
Supplemental Technical Response (Page 14)	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The commercial information contained within this section sets forth the proprietary process ES&S utilizes in performing</p>

	validation on products. This commercial information is related to the security of ES&S system; the disclosure of which would cause substantial harm to ES&S.
Supplemental Technical Response (Page 22-26)	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The commercial information contained within this section sets forth ES&S' organization chart and proprietary project management processes used by ES&S in implementing its voting system; the disclosure of which would cause substantial harm to ES&S.</p>
Supplemental Technical Response (Page 33-39)	<p>GA Code 50-18-72(a)(1) – Public disclosure shall not be required for records that are specifically required by federal statute or regulation to be kept confidential.</p> <p>United States Freedom of Information Act (5 USC 552) Exemption Four provides that trade secret and commercial or financial information from a person that is privileged and confidential shall not be disclosed.</p> <p>The information contained within this section sets forth ES&S' voting system implementation timeline with is commercial information of ES&S; the disclosure of which would cause substantial harm to ES&S.</p>

STATE OF NEBRASKA)

) ss.

COUNTY OF DOUGLAS)

**AFFIDAVIT OF STEVE PEARSON IN SUPPORT OF CLAIM[S]
THAT INFORMATION IS PROTECTED
UNDER GEORGIA LAW FROM DISCLOSURE TO THE PUBLIC**

PERSONALLY APPEARED before the undersigned officer, authorized to administer oaths, Steve Pearson, Affiant who, first being duly sworn, testifies as follows:

1. My name is Steve Pearson. I am of the age of majority and am competent in all respects to give this Affidavit. My testimony herein is based on personal knowledge and upon documents maintained in the files of Election Systems & Software, LLC ("ES&S").

2. ES&S is a supplier of voting system products and services to governmental jurisdictions throughout the United States and Canada headquartered in Omaha, Nebraska. I am the Senior Vice President of Certification for ES&S with primary responsibility for overseeing the review and approval of ES&S' voting systems both at the federal and individual state levels. In my role as Senior Vice President of Certification for ES&S, I am authorized to provide this Affidavit on behalf of ES&S.

3. On July 19, 2019, ES&S submitted a "Redacted Copy" of its proposal and supplemental responses, documentation and other materials provided in response to the State of Georgia Request for Proposal for a Statewide Voting System Number 47800-SOS000037 (referred to hereinafter as the "Submittal") to the Agency Procurement Officer for the Georgia Secretary of State ("GASOS") in compliance with GASOS' Procedures for Submitting Information Pursuant to a Claim that Information in the Submittal is Protected Under Georgia Law from Disclosure to the Public. I affirmatively declare that certain redacted information contained in the Submittal to GASOS is protected under the Georgia Open Records Act, O.C.G.A. § 50-18-70, *et seq.*, from disclosure to the public and that the Redacted Copy is submitted to GASOS for disclosure to the public as is. Support for this declaration, including citation to the specific provision[s] of Georgia law, is included below.

4. The Georgia Open Records Act provides in pertinent part that –

Public disclosure shall not be required for records that are:

(34) Any trade secrets obtained from a person or business entity that are required by law, regulation, bid, or request for proposal to be submitted to an agency. An entity submitting records containing trade secrets that wishes to keep such records confidential under this paragraph shall submit and attach to the records an affidavit affirmatively declaring that specific information in the records constitute trade secrets pursuant to Article 27 of Chapter 1 of Title 10.O.C.G.A. § 50-18-72(a)(34).

5. The Georgia Trade Secrets Act, O.C.G.A. § 10-1-760, *et seq.*, provides that a -

(4) 'Trade secret' means information, without regard to form, including, but not limited to, technical or nontechnical data, a formula, a pattern, a compilation, a program, a device, a method, a technique, a drawing, a process, financial data, financial plans, product plans, or a list of actual or potential customers or suppliers which is not commonly known by or

available to the public and which information:

(A) Derives economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and

(B) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. O.C.G.A. § 10-1-761(4).

6. On behalf of ES&S, I affirmatively declare that ES&S' Full Technical Data Package ("TDP") included in ES&S' Submittal constitute trade secrets pursuant to the Georgia Trade Secrets Act as shown herein.

7. The TDP constitutes a trade secret, because the TDP includes information on the design and operation of each aspect of ES&S' voting system which is not commonly known by or available to the public and derives economic value from not being generally known. ES&S' TDP contains information, including, but not limited to data, formulas, patterns, compilations, programs, devices, methods, techniques, drawing, processes and product plans associated with all aspects of ES&S' voting system. More specifically, the TDP contains the following trade secret information generally described below:

System Functionality Descriptions	The information contained in this category sets forth the scope of the ES&S Voting System's functional capabilities and defines the performance, plans, design, test, manufacture and acceptance context for the system. This information includes ES&S' trade secrets as it identifies the design, functionalities, processes and procedures of ES&S' voting system.
System Hardware Specifications	The information contained in this category identifies the detailed specifications for each ES&S product included in the system. This information contains ES&S' trade secrets as it identifies the plans, designs, capabilities, schematics, and detailed parts lists of ES&S' voting system
Software design and specification	The information contained in this category identifies the functional and physical structure of the products within ES&S' voting system. This information contains ES&S' trade secrets as it identifies the system configuration and functional capabilities as well as the product plans and compilations of ES&S' voting system.
System Test and Verification	The information contained in this Category includes plans, procedures and data used during software development and system integration to verify system logic correctness, data quality and security. This information includes ES&S' trade secrets as it identifies the plans, procedures, development and integration of ES&S' voting system software.
System Security Specifications	The information contained in this category

	how ES&S' voting system verifies that only approved files appear within ES&S' system components. This information contains ES&S' trade secrets as it identifies the configuration, processes, methods, techniques and procedures necessary to verify files within ES&S' system components.
System Operation Procedures	The information contained in this category identifies the approved file lists which are used with the verification procedures. This information contains ES&S' trade secrets as it identifies the configuration, methods, processes and procedures necessary to verify files within ES&S' system components.
System Maintenance Procedures	The information contained in this category identifies how ES&S' voting system is maintained and the steps necessary to conduct preventative and corrective maintenance. The information contained in ES&S' maintenance procedures are ES&S' trade secrets as it identifies the configuration, processes and procedures necessary to maintain ES&S' voting system.
Personnel Deployment/Training	The information contained in this category and identifies ES&S' training information and processes, methods and procedures for training individuals on ES&S' voting systems.
Configuration Management Plan	The information contained in this category describes the policies, processes and procedures employed by ES&S to ensure the overall quality of the Configuration Management and Technical Documentation for the ES&S voting system. The information contained in this document includes ES&S' trade secrets as it identifies ES&S' configuration management, methods, techniques and technical documentation.
Quality Assurance Program	The information contained in this category describes the policies, processes and procedures employed by ES&S to ensure the overall quality of ES&S voting system.
System Change Notes	The information contained in this category describes the details of ES&S voting system changes from one version to another. The information contained in this document identifies ES&S' processes, procedures, product changes from one version of software to a subsequent version.

8. ES&S understands that receipt by GASOS of this Affidavit and the Submittal does not mean that GASOS agrees or has made a determination that the information identified in this Affidavit is protected under the Georgia Open Records Act from disclosure to the public. However, for claims made in this Affidavit that information in the Submittal constitute trade secrets pursuant to the Georgia Trade Secrets Act, I understand that Section 50-18-72(a)(34) of the Georgia Open Records Act proscribes a procedure for producing such information in response to a request under that Act.

FURTHER Affiant saith not.



Steve Pearson
Senior Vice President - Certification
Election Systems & Software, LLC
11208 John Galt Boulevard
Omaha, Nebraska 68137

Subscribed and sworn to before me this 19th day of July, 2019.



Timothy J. Hallett



My Commission expires: January 15, 2020